

FREEMAN MATHIS & GARY
A LIMITED LIABILITY PARTNERSHIP

Reply to Philadelphia office:
1800 John F. Kennedy Blvd.
Suite 1500
Philadelphia, PA 19103
Tel. 267 758 6009
Fax: 267 239.0050

Atlanta office:
100 Galleria Parkway, Suite 1600
Atlanta, Ga. 30339-5948
Tel. 770.818.0000
Fax. 770.937.9960

www.fmglaw.com

Meaghan P. Londergan
Partner

Writer's Direct Access
267.758.6014

mlondergan@fmglaw.com

*Admitted in PA & NJ

October 14, 2016

Via E-file and Fax (973-776-7865)

Hon. Cathy L. Waldor, U.S.M.J.
United States District Court
50 Walnut Street
Newark, New Jersey 07101

Re: Caesar Velazquez v. A-Tech Electric, Inc., Vertical Solutions, Inc., et al.
USDCNJ Case No.: 2:15-cv-03624
Our File No.: 8106.48316

Dear Judge Waldor:

Fact discovery in the above matter is set to close on November 1, 2016. The parties have exchanged written discovery and depositions have been scheduled. However, due to scheduling conflicts with the witnesses and counsel, we will not be able to complete depositions by the current deadline.

Pursuant to this Court's Scheduling Order dated November 17, 2015, all parties jointly request this Honorable Court continue the upcoming deadline for discovery and adjust the Court's present Scheduling Order as follows:

December 15, 2016: End date of discovery.

January 2, 2017 Telephone Conference with the Court
4, 1:00 PM, to be initiated by Plaintiff
January 31, 2017 Final Pretrial Conference with the Court
10:00AM, see ECF No. 30 for details.

Thank you for your attention to this matter.

Cathy L. Waldor
11/1/16

FREEMAN MATHIS & GARY
A LIMITED LIABILITY PARTNERSHIP

- Page 2

Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

/s/ Meaghan P. Lonergan

Meaghan P. Lonergan

cc: Leonard E. Seaman, Esq.
Diane M. Shelley Esq.

MPL/rds/bi

1754175_1